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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
MICHAEL EDISON, )  
 )  
Defendant. )

Criminal No. CR 07-0074 WHA

**STIPULATION AND [PROPOSED]  
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on March 12, 2007, for initial appearance. The defendant was represented by John G. Hanlin, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was continued to March 20, 2007, at 9:30 a.m. for plea and identification of counsel and at 2:00 p.m. for initial appearance before the Honorable William H. Alsup, United States District Court Judge.

The Court made a finding that the time from and including March 12, 2007, through and including March 20, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C.

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§ 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C.

§ 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until March 20, 2007, and that the exclusion of time until then be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendant.

DATED: March 12, 2007

/s/  
JOHN G. HANLIN  
Counsel for Michael Edison

DATED: March 12, 2007

/s/  
JEFFREY R. FINIGAN  
Assistant U.S. Attorney

So ordered.

DATED: March 14, 2007

JOSEPH C. SPERO  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
CLERK OF COURT  
JUDGE  
JUDGE JOSEPH C. SPERO